

### Remarks

Claims 1-15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Garrett et al. (U.S. Patent No. 5,325,291). This rejection is respectfully, but most strenuously, traversed and its reconsideration is requested. Claims 1-15 remain pending.

An "obviousness" determination requires an evaluation of whether the prior art taken as a whole would suggest the claimed invention taken as a whole to one of ordinary skill in the art. In evaluating claimed subject matter as a whole, the Federal Circuit has expressly mandated that functional claim language be considered in evaluating the claim relative to the prior art. Applicants' respectfully submit that the application of these standards to the independent claims presented herewith leads to the conclusion that the recited subject matter would not have been obvious to one of ordinary skill in the art based on the applied patent. Rather, in analyzing the independent claims presented herewith "as a whole", it is respectfully submitted that there are numerous features of applicants' claimed technique which are simply not taught, suggested or implied by Garrett et al.

For example, applicants' independent claims recite a method of invoice entry, an invoice entry system, and a computer program product for instructing a processor to entry invoices. In comparison, a careful reading of Garrett et al. fails to uncover any discussion of a process for entering invoices into a database. Rather, Garrett et al. present a technique for verifying insurance on registered vehicles. Thus, applicants respectfully submit that the problem addressed by Garrett et al. is clearly different from that addressed by applicants. Garrett et al. do not discuss a technique for verifying the accuracy of invoice information entered into a database, let alone a particular technique such as recited by applicants in the independent claims presented herewith.

More particularly, applicants recite a method of invoice entry which includes entering data from an invoice, by a first person, into a first database having a status indicator associated with the data from the invoice, and setting the status indicator to entered. A subset of the data from the invoice is then entered by a second person different from the first person, into the same

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database. The technique then matches the subset of data entered by the second person with the corresponding subset of data entered by the first person and highlights any unmatched entries. This is essentially an audit of the data entered by the first person into the database. Subsequent to the matching step, any unmatched entries are reentered by the second person, and the status indicator is changed to audit passed, or the status indicator is set to audit failed, or the status indicator is set to audit passed if there are no unmatched entries. Thereafter, the entered invoice data by the first person is posted to a second database if the status indicator is audit passed. Otherwise, the first person reenters any unmatched entries, and changes the status indicator to reentered and thereafter proceeds to the matching step, or changes the status indicator to cancel, thereby canceling the data entered by the first person. Applicants respectfully submit that there is little overlap between their above-summarized invoice entry technique and the verification methods described by Garrett et al. for comparing data in a vehicle database with data in an insurance database.

By way of example, and as acknowledged in the Office Action, Garrett et al. do not disclose entering data from an invoice. The Office Action, however, alleges that it would have been obvious to one of ordinary skill in the art to employ the teachings of Garrett et al. with entering of data from an invoice. This conclusion is respectfully traversed. A careful reading of Garrett et al. fails to uncover any suggestion or implication that the information in the state database 200 or the insurance database 400 was or should have been entered from an invoice. Again, Garrett et al. do not discuss invoices, nor do they present any technique for accurately entering data from an invoice into a database, as is the case with applicants' claimed invention. Applicants respectfully submit that the art must present some teaching, suggestion or incentive for making the proposed modification of Garrett et al. The purpose of Garrett et al. is to determine the presence, maintenance, and/or absence of automobile insurance on registered vehicles. A careful reading thereof fails to uncover any discussion of entering invoice data into a database, let alone a technique such as recited by applicants for insuring the accuracy of the information entered into the database.

Further, applicants recite that the invoice data is being entered by a first person into the first database, and that a second person is auditing the accuracy of that data by entering a subset of the data from the invoice into the same database. The subset of the data entered by the second person is compared with the corresponding data entered by the first person and any unmatched entries are highlighted. In practice, the subset of data entered by the second person could comprise critical data from the invoice that must match in order for the data to be posted to the second database. A careful reading of Garrett et al. fails to uncover any discussion of entering data from an invoice by a first person, and thereafter checking the accuracy of the entered data by entering a subset of the data from the invoice by a second person into the same database. The teachings of Garrett et al. are simply inapplicable to this concept.

Garrett et al. present a technique for monitoring the presence or absence of vehicle insurance on state registered vehicles. The technique employs a state vehicle database comprising records of preselected vehicle and individual information, and an insurance database, which contains insurance company records identifying individual information as well as the insurance for particular vehicles. Although the data in the two different databases is in all likelihood entered by different individuals, that is where the similarity between applicants' invention and the teachings of Garrett et al. end. Applicants recite entering data from an invoice by a first person into a database. The data is then checked by entering a subset of the data from the invoice, by a second person into the same database. A careful reading of Garrett et al. fails to uncover any suggestion or implication that the information in the state database and the information in the insurance company database were entered from the same invoice as recited by applicants. This is not surprising, however, since the state database and insurance company database are maintained by completely separate entities for different purposes.

Still further, applicants respectfully traverse the conclusion in the Office Action that the teachings of Garrett et al. could be extended to say that the data is stored in a single database. To reach this conclusion would nullify the need for the system of Garrett et al. As explained therein, Garrett et al. provide a technique for determining the presence, maintenance and/or absence of automobile insurance on registered vehicles. The technique assumes the existence of

first input data from the public sector, i.e., the state vehicle database, and second input from the private sector, i.e., an insurance company database. Applicants respectfully traverse the conclusion in the Office Action that one could modify the environment of Garrett et al. to have the data recorded in a single database. The first database is maintained by the public sector, i.e., Department of Motor Vehicles, while the second database is maintained by the private sector, i.e., the insurance company. There is no justification in the art for modifying the teachings of Garrett et al. and applying those teachings to data recorded twice in a single database since the public sector is not going to aggregate its responsibilities to the private sector, nor readily assume those private sector responsibilities. Thus, applicants respectfully traverse the alleged rationale for modifying the teachings of Garrett et al. in this regard suggested in the Office Action.

Further, applicants respectfully submit that one of ordinary skill in the art would not have modified the teachings of Garrett et al. as suggested in the Office Action, since to do so would abrogate the need for the Garrett et al. invention. The point of Garrett et al. is to ascertain the presence, maintenance and/or absence of automobile insurance on registered vehicles. The reason this is a problem is that there are two databases, one maintained by the public sector and one maintained by the private sector. If the two were to be merged as suggested in the Office Action, there would be no need for the teachings of Garrett et al. since the information would already be correlated in a single database.

Still further, applicants respectfully submit that there is no teaching, suggestion or implication in Garrett et al. for reentering unmatched entries by the second person and changing the status indicator to audit passed, or setting the status indicator to audit failed, or setting the status indicator to audit passed if there are no unmatched entries. Similarly, a careful reading of Garrett et al. fails to uncover any discussion of posting the entered invoice data by the first person to a second database, i.e., if the status indicator is audit passed. Otherwise, reentering the unmatched entries by the first person, changing the status indicator to reentered and thereafter proceeding again to the matching step, or changing the status indicator by the first person to cancel, thereby canceling the entered invoice data. Garrett et al. simply fail to teach, suggest or imply any of these concepts. Garrett et al. do teach moving data to a second database, i.e., the

exception database 600, if no match is found. To the extent applicable, this is the opposite of what applicants' invention recites. Specifically, applicants recite the posting of invoice data entered by the first person to a second database if the status indicator is audit passed. Using applicants' approach, the first database may comprise a data changeable database as represented by the reentering step, while the second database is the ultimate database to which the data is to be posted. Garrett et al. do not suggest or imply such a technique. Only audit passed data in applicants' invention is moved to the second database. Garrett et al. do not provide any suggestion or implication that the technique thereof should be extended in this manner since there would be no need to move the data in the insurance company database to still another database for retrieval.

To summarize, there are significant differences between applicants' invention and the techniques described by Garrett et al. These differences are believed due to the fact that the two techniques are addressing different problems. In Garrett et al., there exists a public sector database and a private sector database between which information is to be compared in order to determine the presence, maintenance and/or absence of automobile insurance on registered vehicles. In contrast, applicants recite a technique for posting entered invoice data to a database. The technique insures the accuracy of the invoice data entered by a first person by having a second person enter a subset of the data from the invoice into the same database and then matching the subset of the data entered by the second person with the corresponding data entered by the first person. If performed correctly, the two should be identical. That is, the same data was entered correctly by two different persons using the same invoice. If the status indicator is set to audit passed, then the method includes posting the entered invoice data by the first person to a second database. The process of Garrett et al. is simply not analogous to applicants' claimed invention.

For all the above reasons, applicants respectfully request reconsideration and withdrawal of the obviousness rejection to the independent claims presented herewith based upon the teachings of Garrett et al. The dependent claims are believed allowable for the same reasons as the independent claims, as well as for their own additional characterizations.

If the Examiner wishes to discuss this application with applicants' attorney, the Examiner is invited to contact their below-listed representative. The application is believed to be in condition for allowance and such action is respectfully requested.

Respectfully submitted,



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